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December 31, 2001

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Ms. Magalie Roman Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

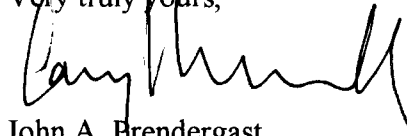
***Re: CC Docket No. 94-102 / Fourth Quarterly TTY Implementation Report  
Broadband PCS Stations KNLH424, KNLG212, KNLF775 and KNLF768  
PVT Wireless Limited Partnership***

Dear Ms. Salas:

On behalf of PVT Wireless Limited Partnership ("PVT"), we hereby submit their fourth quarterly report on implementation of TTY access to 9-1-1 emergency services, pursuant to the Commission's *Fourth Report and Order* in CC Docket No. 94-102, *released* December 14, 2000.

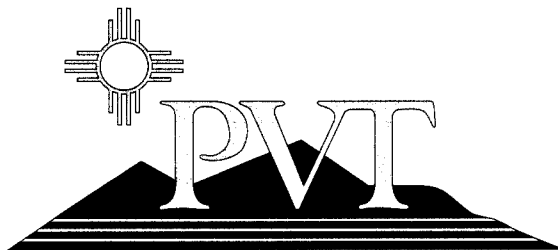
Please contact the undersigned counsel if you have any questions.

Very truly yours,



John A. Prendergast  
D. Cary Mitchell  
Counsel to PVT Wireless Limited Partnership.

Att.



December 28, 2001

Ms. Magalie Roman Salas, Secretary  
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Federal Communications Commission  
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**Re: CC Docket No. 94-102 / Fourth Quarterly TTY  
Implementation Report  
Broadband PCS Stations KNLH424, KNLG212, KNLF775  
and KNLF768  
BTA068 F – Carlsbad, NM  
BTA068 E – Carlsbad, NM  
BTA386 C1 – Roswell, NM  
BTA191C1 – Hobbs, NM**

Dear Ms. Salas:

PVT Wireless Limited Partnership (“PVT”) hereby submits its fourth quarterly report on implementation of TTY access to 9-1-1 over its digital wireless network, pursuant to the Commission’s *Fourth Report and Order* in CC Docket No. 94-102.<sup>1</sup>

PVT has launched its service on the Carlsbad E-Block and Roswell C1-Block using Nortel CDMA equipment, and has configured these systems to operate in conjunction with the Sprint PCS network. PVT is currently planning to abide by the TTY technical standards and solutions adopted by Sprint PCS. In this regard, it is PVT’s understanding that the necessary baseload software for Nortel’s digital TTY solution has only recently been made available to Sprint PCS, and that Sprint PCS is currently testing the Nortel solution with various TTY compatible handsets. We understand that Sprint PCS will be providing additional information about TTY access on its network through the TTY Forum.

<sup>1</sup> In the Matter of Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Fourth Report and Order*, CC Docket 94-102, 15 FCC Rcd 25216 (December 28, 2000), (“*Fourth Report and Order*”).

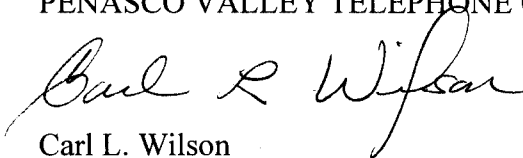
Magalie Roman Salas, Secretary  
December 28, 2001  
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PVT is encouraged by the progress that Nortel has made in developing a TTY solution for its CDMA customers and looks forward to the results of testing by Sprint PCS. However, because PVT is a small carrier, it does not have the resources to obtain network software and infrastructure equipment before it has been fully tested and it is commercially available to all carriers. PVT will therefore not be able to meet the December 31, 2001 deadline by which carriers operating digital systems must have obtained all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices. To the extent necessary, PVT requests that the Commission waive the December 31, 2001 requirement. It should be emphasized that the waiver is being requested out of an abundance of caution; and that, in any event, a waiver does not appear to be necessary because there is no mention of the December 31, 2001 deadline in Section 20.18(c) of the Commission's Rules. PVT will make every effort to implement TTY capability in these markets by the June 30, 2002 deadline.

With regard to the Hobbs C1-Block system, PVT has previously notified the Commission that its digital wireless network in this market is compliant with the Commission's TTY access requirements.<sup>2</sup>

Respectfully submitted,

PEÑASCO VALLEY TELEPHONE COOPERATIVE, INC.



Carl L. Wilson  
Vice President - Administration

CLW:pao

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<sup>2</sup> See Third Quarterly TTY Implementation Report of PVT Wireless Limited Partnership, filed October 15, 2001.